



Attorneys at Law

45 BROADWAY, SUITE 430, NEW YORK, NEW YORK 10006

TEL: (212) 248-7431 FAX: (212) 901-2107

February 18, 2022

VIA ECF

Hon. Steven Tiscione
United States Magistrate Judge
Eastern District of New York
100 Federal Plaza
Central Islip, NY 11722

Re: **Jane Doe v. Long Island Motors and David Delvecchio**
Dkt. No. 21-cv-1232 (GRB)(ST)

Your Honor:

This office represents Plaintiff, Jane Doe, in the above-referenced action. Plaintiff writes per the Court's Order dated January 14, 2022 to identify witnesses and a general description of the expected testimony. Plaintiff identifies:

- Plaintiff
 - Plaintiff will testify regarding liability and damages. Plaintiff will testify regarding the sexual harassment she endured working at Defendant Long Island Motors by Defendant David Delvecchio. Plaintiff will also testify regarding the damages she suffered including economic damages and emotional distress.
- Plaintiff's mother
 - Plaintiff's mother will testify regarding emotional distress damages suffered by Plaintiff as a result of Defendants' conduct.

Plaintiff thanks the Court for its time and consideration of the herein request.

Respectfully submitted,

/s/

Joshua M. Friedman, Esq.